



The Commonwealth of Massachusetts

DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY

WESTERN MASSACHUSETTS ELECTRIC COMPANY

D.T.E. 04-106

THIRD SET OF INFORMATION REQUESTS OF THE DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY TO WESTERN MASSACHUSETTS ELECTRIC COMPANY

Pursuant to 220 C.M.R. § 1.06(6)(c), the Department of Telecommunications and Energy ("Department") submits to Western Massachusetts Electric Company ("WMECo" or "Company") the following Information Requests:

INSTRUCTIONS

The following instructions apply to this set of Information Requests and all subsequent Information Requests issued by the Department to the Company in this proceeding.

1. Each request should be answered in writing on a separate, three-hole punch page with a recitation of the request, a reference to the request number, the docket number of the case and the name of the person responsible for the answer.
2. Do not wait for all answers to be completed before supplying answers. Provide the answers as they are completed.
3. These requests shall be deemed continuing so as to require further supplemental responses if the Company or its witness receives or generates additional information within the scope of these requests between the time of the original response and the close of the record in this proceeding.
4. The term "provide complete and detailed documentation" means:

Provide all data, assumptions and calculations relied upon. Provide the source of and basis for all data and assumptions employed. Include all studies, reports and planning documents from which data, estimates or assumptions were drawn and support for how

the data or assumptions were used in developing the projections or estimates. Provide and explain all supporting work-papers.

5. The term “document” is used in its broadest sense and includes, without limitation, writings, drawings, graphs, charts, photographs, phono-records, microfilm, microfiche, computer printouts, correspondence, handwritten notes, records or reports, bills, checks, articles from journals or other sources and other data compilations from which information can be obtained and all copies of such documents that bear notations or other markings that differentiate such copies from the original.
6. If any one of these requests is ambiguous, notify the Hearing Officer so that the request may be clarified prior to the preparation of a written response.
7. Please file one copy of the responses with Mary L. Cottrell, Secretary of the Department and with all parties; also submit two (2) copies of the responses to John J. Geary, Hearing Officer; one (1) copy of the responses to Sean Hanley, Assistant Director, Rates and Revenue Requirements Division; one (1) copy of the responses to Paul E. Osborne, Assistant Director, Rates and Revenue Requirements Division; one (1) copy of the responses to Jeff Hall, Analyst, Rates and Revenue Requirements Division; one (1) copy of the responses to Joseph Passaggio, Rates and Revenue Requirements Division; one (1) copy of the responses to Xuan Yu, Analyst, Rates and Revenue Requirements Division; one (1) copy of the responses to Meera Bhalotra, Analyst, Rates and Revenue Requirements Division; and one (1) copy of the responses to Claude Francisco, Analyst, Rates and Revenue Requirements Division.

For Bulk Responses, one (1) copy should be submitted directly to John Geary and one (1) copy should be submitted directly to Paul Osborne.

8. All non-proprietary responses should be submitted by e-mail to dte.efiling@state.ma.us and to the e-mail address of any party required to be served.
9. Responses are due by the close of business (5:00 p.m.) Monday, December 20, 2004.

INFORMATION REQUESTS

- DTE 3-1 Please provide a description of the NUSmart program. Include, among other details, how the program operates, what means of outreach the Company uses to contact eligible customers, whether the Company coordinates its efforts with other low-income programs, whether the Company allows for renegotiated payment plans for eligible customers, what the period of regular payments are required before arrearages are forgiven and how that compares to similar

programs operated by other Massachusetts utilities, and how the Company measures the success of the program. In addition, please provide documentation (e.g., pamphlets, brochures, etc.) that the Company, or its affiliates have produced that describe the NUStart program.

DTE 3-2 Refer to the bulk response to Information Request DTE 1-25, at 65-66. Please provide an overview of the payment incentive pilot program that is described here. Were the results of this pilot program sufficient to warrant the expansion of the pilot program from 100 to 600 customers? Please discuss. Pursuant to the review that WMECo was to perform at the end of 1999, did the Company elect to continue this pilot program?

DTE 3-3 Refer to the Company's response to Information Request DTE 1-18, at 2. Please explain in detail the nature of the \$2,314,000 income tax adjustment for test year taxes. In addition, explain the increase in this adjustment from the \$239,000 appearing in Exh. C, Att. 2, Sch. 8 of the Company's initial filing.

DTE 3-4 Refer to the Company's response to Information Request DTE 1-18, at 2. Please explain in detail (1) the \$1,829,000 income tax adjustment for permanent and flow through differences and (2) why these taxes are not recovered through the creation of a regulatory asset pursuant to Financial Accounting Standards Board 109.